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14 *Attorneys for Defendants LG Electronics, Inc.*

15 UNITED STATES DISTRICT COURT

16 NORTHERN DISTRICT OF CALIFORNIA

17 SAN FRANCISCO DIVISION

18 IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

19 This Document Relates to:

20 *All Indirect Purchaser Actions*

**DECLARATION OF CLAIRE YAN IN
SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO SEAL**

21 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*
22 *No. 11-cv-05513*

[Administrative Motion to Seal and [Proposed]
Order filed concurrently herewith]

23 *Best Buy Co., et al. v. Technicolor SA, et al.,*
24 *No. 13-cv-05264*

Judge: Hon. Samuel Conti
Date: None Set
Ctmm: 1, 17th Floor

25 *Sears, Roebuck and Co. and Kmart Corp. v.*
26 *Technicolor SA, No. 3:13-cv-05262*

27 *Sears, Roebuck and Co. and Kmart Corp. v.*
28 *Chunghwa Picture Tubes, Ltd., No. 11-cv-*
05514

1 *Sharp Electronics Corp., et al. v. Hitachi Ltd.,*
2 *et al.*, No. 13-cv-1173

3 *Sharp Electronics Corp., et al. v. Koninklijke*
4 *Philips Elecs., N.V., et al.*, No. 13-cv-2776

5 *Siegel v. Hitachi, Ltd.*, No. 11-cv-05502

6 *Siegel v. Technicolor SA*, No. 13-cv-05261

7 *Target Corp. v. Chunghwa Picture Tubes,*
8 *Ltd.*, No. 11-cv-05514

9 *Target Corp. v. Technicolor SA*, No. 13-cv-
10 05686

11 *ViewSonic Corporation v. Chunghwa Picture*
12 *Tubes Ltd.*, No. 14-cv-2510

1 I, Claire Yan, declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of record
3 for Defendant LG Electronics, Inc. ("LGE") in the above entitled action. I am licensed in the State
4 of California and admitted to practice before this Court. I make this declaration based on my
5 personal knowledge and, if called upon as a witness, could and would testify competently as to the
6 matters set forth below.

7 2. Pursuant to Civil Local Rule 7-11 and 79-5, I make this declaration in support of
8 the LGE Defendants' Administrative Motion to Seal.

9 3. LG seeks permission to file under seal the highlighted portions of the sealed
10 version of Defendants' Motion *In Limine* No. 8 to Exclude Evidence or Argument Relating to
11 Damages From "Spillover" or "Ripple" Effects of Foreign Price-Fixing Activities on U.S. Prices.

12 4. The portions the documents referenced in Paragraph 2 contain discussion, analysis,
13 references to, or information taken directly from, material designated by a Party in this matter as
14 "CONFIDENTIAL" under the Stipulated Protective Order (Dkt. No. 306) in this case.

15 5. LG further seeks permission to file under seal the following documents in their
16 entirety Exhibits 2 and 3 to the Declaration of Claire Yan in Support Defendants' Motion *In*
17 *Limine* No. 8 to Exclude Evidence or Argument Relating to Damages From "Spillover" or
18 "Ripple" Effects of Foreign Price-Fixing Activities on U.S. Prices.

19 6. The documents referenced in Paragraph 5 were produced by Defendant Philips in
20 this litigation and have been designated "CONFIDENTIAL" by Philips under the Stipulated
21 Protective Order (Dkt. No. 306).

22 7. LGE seeks to submit the above material under seal in good faith in order to comply
23 with the Stipulated Protective Order in this action and the applicable Local Rules. Because the
24 information LGE seeks to submit under seal has been designated as Confidential or Highly
25 Confidential by other parties, LGE is filing the accompanying Administrative Motion, and will be
26 prepared to file an unredacted versions of the above-referenced documents in the public record if
27 required by Civil Local Rule 79-5(e).

28

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed on February 13, 2015, in Los Angeles, California.

4
5 /s/ Claire Yan

6 CLAIRE YAN
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